UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

MISSOURI PRIMATE FOUNDATION,)	
CONNIE BRAUN CASEY, individually,)	
ANDREW SAWYER, individually, and)	
JANE DOES 1 and 2,)	
)	
Plaintiffs and Counterclaim)	
Defendants,)	
) Case No. 4:16-cv-02163	3
V.)	
)	
PEOPLE FOR THE ETHICAL)	
TREATMENT OF ANIMALS, INC. and)	
ANGELA SCOTT a/k/a ANGELA G.)	
CAGNASSO, individually,)	
)	
Defendants and)	
Counterclaim Plaintiffs.)	
)	

MOTION FOR LEAVE TO WITHDRAW

COME NOW counsel for Plaintiff/Counterclaim Defendant Connie Braun Casey ("Plaintiff"), Daniel T. Batten, Brian D. Klar, and the law firm of Klar, Izsak & Stenger, LLC ("Plaintiff's Counsel"), and hereby respectfully move for this Court's Order granting Plaintiff's Counsel leave to withdraw their representation of Plaintiff. In support of this Motion, Plaintiff's Counsel states as follows:

- 1. Plaintiff has terminated Plaintiff's Counsel's representation and has discharged Plaintiff's Counsel in this case. Plaintiff has also failed substantially to fulfill Plaintiff's ongoing financial obligations to Plaintiff's Counsel, and Plaintiff has been given reasonable notice that Plaintiff's Counsel must withdraw in the absence of Plaintiff's fulfillment of those obligations.
- 2. Plaintiff's Counsel's withdrawal can be accomplished without materially adversely effecting Plaintiff's interests.

WHEREFORE, Counsel for Plaintiff/Counterclaim Defendant Connie Braun Casey ("Plaintiff"), Daniel T. Batten, Brian D. Klar, and the law firm of Klar, Izsak & Stenger, LLC, respectfully pray that this Court grant the instant Motion instanter, allow them to withdraw, and for such other and further relief as this Court deems just and proper.

Dated this 22nd day of August, 2018.

Respectfully Submitted,

KLAR, IZSAK & STENGER, L.L.C.

By: /s/ Brian D. Klar_

BRIAN D. KLAR, #36430 DANIEL T. BATTEN, #58810

Attorneys for Defendant 1505 S. Big Bend Blvd. St. Louis, Missouri 63117 Phone: 314-863-1117

Fax: 314-863-1118

Email: <u>bklar@lawsaintlouis.com</u> dbatten@lawsaintlouis.com

Case: 4:16-cv-02163-CDP Doc. #: 104 Filed: 08/22/18 Page: 3 of 3 PageID #: 1164

CERTIFICATE OF SERVICE

I hereby certify that on **August 22, 2018**, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system, by which notification of such filing was electronically sent and served via first class mail, postage prepaid, to the following:

POLSINELLI PC
KELLY J. MUENSTERMAN (#66968)
JAMES P. MARTIN (#50170)
100 S. Fourth Street, Suite 1000
St. Louis, MO 63102
314.889.8000
Fax No: 314.231.1776
kmuensterman@polsinelli.com
jmartin@polsinelli.com

PETA FOUNDATION
JARED S. GOODMAN
(Admitted *Pro Hac Vice*)
2154 W. Sunset Blvd.
Los Angeles, CA 90032
323.210.2266
Fax No: 213.484.1648
Attorneys for Defendant/Counterclaim Plaintiff

Patrick J. Hanley, Esq. 214 E. Fourth Street Covington, KY 41011 Attorney for Plaintiff/Counterclaim Defendant Vito Stramaglia

Missouri Primate Foundation 12338 State Road CC Festus, MO 63028

Geordie Duckler 9397 SW Locust Street Tigard, OR 97223 geordied@animallawpractice.com Attorneys for Plaintiff/Counterclaim Defendant Andrew Sawyer

/s/ Brian D. Klar